

Thomas H. Belknap, Jr.  
Richard V. Singleton II  
Blank Rome LLP  
405 Lexington Avenue  
New York, NY 10174  
(212) 885-5270  
[tbelknap@blankrome.com](mailto:tbelknap@blankrome.com)  
*Counsel for Compañia Sud Americana  
De Vapores S.A.*

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

COMPAÑIA SUD AMERICANA DE VAPORES  
S.A.,

Petitioner,

-against-

AGENTES Y ESTIBADORES PORTUARIOS,  
S.A.

Respondent.

15-cv-03619 (GBD)

**NOTICE OF MOTION BY COMPAÑIA SUD AMERICANA DE VAPORES S.A.  
FOR PRELIMINARY ANTI-SUIT INJUNCTION**

PLEASE TAKE NOTICE, that upon the annexed Affidavit of Thomas H. Belknap, Jr. dated May 8, 2015, all the exhibits annexed thereto, and the accompanying Memorandum of Law in support of COMPAÑIA SUD AMERICANA DE VAPORES S.A.'s ("CSAV") Motion for Preliminary Anti-Suit Injunction, shall move this court at a date to be set by the court, before Hon. George B. Daniels, United States District Judge, at the United States District Court for the Southern District of New York, 500 Pearl Street, New York, New York for an order:

- A. That CSAV's application for a preliminary injunction enjoining Ageport, whether by itself or through its directors, employees, officers, or agents (collectively "Ageport Group"), from commencing, pursuing, or taking any steps in, or procuring or assisting the commencement or pursuit of, any proceeding outside the arbitration proceedings in New York in respect of any disputes between

CSAV and Ageport arising under or in connection with the CSAV Agency Agreement, including without limitation, any questions regarding its existence, validity or termination or as to the rights, duties or liabilities of any of the parties arising out of or in relation to the said contract (the “Disputes”) be GRANTED;

- B. That this preliminary injunction shall further enjoin Ageport Group from (i) commencing, pursuing, or taking any steps in, or procuring or assisting the commencement or pursuit of, any proceeding which seeks damages and/or compensation from E.T. Heinsen in relation to the Disputes and/or the termination by CSAV of the CSAV Agency Agreement, or (ii) taking any steps seeking to interfere with the activities of E.T. Heinsen, in providing any agency services to Hapag Lloyd, by threatening DP World Cucedo, or otherwise howsoever, in connection with the Disputes;
- C. That this preliminary injunction shall further enjoin Ageport Group from taking any steps whatsoever to obtain security of any form in support of proceedings encompassed by paragraphs (A) and (B) above, provided, however, that it shall not enjoin Ageport from seeking any relief to which it may otherwise be entitled in connection with the New York arbitration proceedings
- D. And granting CSAV such further and additional relief as the Court may deem just and proper.

Dated: New York, New York  
May 26, 2015

**BLANK ROME LLP**

*Attorneys for*

*COMPANÍA SUD AMERICANA DE VAPORES S.A.*

/s/ Thomas H. Belknap, Jr.

Thomas H. Belknap, Jr. (TB 3188)

The Chrysler Building

405 Lexington Avenue

(212) 885-5270

[tbelknap@blankrome.com](mailto:tbelknap@blankrome.com)